

**Summary of July 20, 2000
Indiana Department of Environmental Management (IDEM) and
Clean Manufacturing and Safe Materials Institute (CMTI)
Meeting with Metal Finishers and POTWs Participating in
Metal Finishing Strategic Goals Program**

The meeting was called to order at 1:05 p.m. by facilitator Kathy Watson. The facilitator welcomed meeting participants and summarized the main meeting agenda items. The current SGP meeting list was circulated so meeting participants could indicate their attendance and note any additions/corrections to contact, address, phone, fax or e-mail information as needed.

OPENING REMARKS FROM IDEM

After introductions by those in attendance, IDEM Deputy Commissioner Tim Method provided brief opening remarks and circulated the front section of the June 2, 2000 Fort Wayne News Sentinel. Featured on the front page of this edition was an article on the SGP and local efforts by Ft. Wayne SGP metal finisher Metal Plate Polishing.

NATIONAL/REGIONAL UPDATES

**Debbie Dubenetzky/IDEM on behalf of
Matt Gluckman, EPA Region 5 Pretreatment Coordinator and SGP Lead**

Matt Gluckman sends his regrets for not being able to attend today's meeting, but has provided some prepared remarks and information updates to be shared as follows:

Highlights from SGP Summit at Annual Industry SURFIN Conference in Chicago, June 26 and 27, 2000:

- Distribution of documents from the Summit:
 - National map showing number of participating facilities, states, POTWs/local governments, EPA Regions,
 - State "report cards" and note that Indiana has 16, not 15 participating facilities. Indiana facilities are leaders nationally as several companies are making substantial progress for each of the SGP facility-based goals, and
 - Information about the new industry contacts – Coventry Group and GETF.
- Industry goal is to get baseline and other reports in during the next several months. Will then focus on recruiting additional firms.
- National Center for Manufacturing Sciences Benchmarking Metal Finishing Study is final and will be distributed free-of-charge to all SGP participants. Noted that IDEM just received their copy in the mail. Others can purchase it for \$55 – Debbie has order forms (distributed to meeting participants).
- State-specific report card information is incomplete as several companies nationally still need to submit baseline and annual performance data. EPA needs this data, and strong showing of industry interest to continue national and regional support for the SGP.
- Nationally, EPA role will primarily be to facilitate data collection and technical assistance, pursue policy and regulatory issues and coordinate within the Agency. With this support, state and local programs need to be striving to be self-sustaining.
- Consensus to continue the program after 2002. Industry leaders recognize this may mean an industry-run or supported program.
- POTW priorities include finalization of Pretreatment Streamlining, continued funding for the program, and culture change so support of the program is more widespread.
- Intensive EMS workshops held in Southern California appear to be worthwhile and EPA looking at ways to support similar training in Region 5.
- Tangible benefits continue to be focused in the wastewater pretreatment area; intangible benefits such as access to regulators, recognition, and consideration for future performance-based benefits were emphasized.
- EPA will be working on a national SGP report card that reflects the assessments of the various stakeholder groups on how the program has functioned, an action plan and recommendations for the future.

Regulatory Updates:

- Metal Products and Machinery (MP & M) proposal expected to be signed 10/31/00, published shortly thereafter. Proposal will likely include:
 - separate subcategory for job shops,
 - for most subcategories, limits would be concentration-based, with control authority discretion to set mass-based limits,
 - Authority for control authorities to waive monitoring for pollutants not present,
 - 3 options for limiting organics,
 - a flow cutoff for metal finishing job shops – to be determined,
 - 40 CFR 413 and 433. MP & M would replace these standards for facilities in-scope. Below the flow cutoff, facilities would remain subject to 413 or 433. Comments will be solicited on eliminating 413 even in these situations.
 - Pollution prevention alternative for metal finishing job shops being considered. Facilities able to demonstrate to their control authority that they're using specific pollution prevention and best management practices would be able to remain subject to the metal finishing (433) or electroplating (413) standards instead of complying with MP & M.
- Pretreatment Streamlining – currently a lower priority by EPA's Office of Water. Bob Benson was going to convey message from SGP Implementation Group to Office of Water urging that this rulemaking be finalized.
- FOO6 – 180 day storage rule finalized. States now need to adopt. RCRA benchmarking study also completed, and group supporting delisting of ion exchange canisters. This recommendation currently being assessed by EPA Office of Solid Waste (OSW).

Others attending the SGP Summit included Sue Claussen and Mike Hoffman of the Michigan City Sanitary District. Sue shared notes from the POTW sessions as follows:

- EPA considering total organic compounds as an indicator substitution,
- Monitoring in process for cyanide,
- Use best management practices for low flow, will be asking for comments on how regulations being written, but Sue unsure if comments coming before or after publication,
- Using organic management program for MP & M,
- Deadlines key off publication in the Federal Register, with a compliance date sometime in 2005.

A question arose whether the low flow setpoint had been determined, and response was that it has not yet been determined - no answer was provided at the SURFIN Conference.

INDIVIDUAL WORKGROUP REPORTS

RCRA Issues Workgroup

Workgroup co-lead Mark Sutton of H.H. Sumco presented an update of major items under review by the RCRA Workgroup as follows:

1. Model variance request on behalf of Sumco almost completed. A final request will be submitted to IDEM following review and approval by Sumco management.
2. State-to-state reciprocity for solid waste variances and hazardous waste delisting – developing issue paper to be presented to Mindy Gampel of EPA Headquarters. Issue paper would present this issue as an SGP barrier and tie it to specific SGP goals. Without reciprocity, platers are discouraged from using opportunities like variance requests and delisting to specific goals.
3. Mark Stoddard/OPPTA distributed a preliminary work-in-progress listing of recyclers. If others need a copy, they can contact Mark Stoddard or Mark Sutton.
4. Ted Heemstra distributed information from SURFIN that provided a description of two general cases of ion exchange that could be used for pollution prevention – one dealing with regeneration in-house in lieu of sending it off-site and one involving purification of existing plating or acid dip baths.
5. Final federal rule to increase accumulation time to 180 days for large quantity generators of F006 being reclaimed became effective on 3/8/00. IDEM currently in final stages of preparing a non-rule policy document. This policy is an enforcement discretion policy to allow compliance with the federal regulation, in lieu of state requirements, during the interim period it takes the state to adopt the federal standard.

Performance Ladder/5-Star Workgroup

1. Workgroup lead Cheri Storms reported that no comments have been received on the draft 5-Star program criteria presented at the last full stakeholder meeting in April. Therefore, we will move forward with this proposal with plans to put the 5-Star program in place by the spring of 2001.
2. Although the workgroup has not met since April, a future meeting is planned in the next few weeks. The workgroup will be focusing on adding benefits to the 5-Star program proposal. Anyone interested to participate in this workgroup is urged to see or contact Cheri.

Technical and Financial Assistance Workgroup

Shayla Barrett of CMTI provided the following updates:

1. CMTI has not yet received word back on the status of the Strategic Development Fund grant proposal submitted to the Department of Commerce in May. Dr. Corson will be following up on this.
2. Mark Stoddard of OPPTA has found some grant dollars to be made available for pollution prevention challenge grants. An idea for a potential project is currently under development/consideration and CMTI hopes to report on this in the next SGP newsletter.
3. Beginning the first of August, CMTI is conducting on-site drag-out seminars at no charge to interested SGP metal finishers using videotape and conductivity meters. For non-SGP companies, the fee is \$50. Seminars are currently planned in Indianapolis and Ft. Wayne. Interested companies should contact Shayla/CMTI.
4. Shayla also noted the national benchmarking study has been completed and copies are now available at no charge to SGP participants. Non-SGP participants may purchase a copy – order forms were distributed. For additional order forms, interested parties may contact either CMTI or Debbie Dubenetzky/IDEM.

Recruitment Workgroup

1. Jerry Phillips reported that Indiana now has 16 companies officially signed on and 9 POTWs/municipalities. The national industry goal is 600 companies by the time of the annual AESF meeting in late January 2001. There are currently about 430 signed on nationally.
2. Critical emphasis now is on getting baseline and annual performance worksheets submitted so EPA can compile data to make the case that this program should continue. Although okay in Indiana, some states are very weak in the number of participating metal finishers who have completed/submitted vital performance documentation.
3. Program marketing/outreach – slow time of year for tradeshow.
4. Shayla also working to try to set up SGP awareness/recruitment meetings in Evansville and Muncie. Sessions were recently held in South Bend, Elkhart, and Ft. Wayne with the POTWs and their local metal finishers. We have unofficially heard that one additional Ft. Wayne company has since signed on.

POTW Issues Workgroup

Sue Claussen reported that the POTW workgroup lost a couple of key members in the last few months and is working to bring Elkhart folks new to the SGP up-to-speed on the program. Any other POTWs interested in joining the workgroup should let Sue know. Sue also reported that:

1. Indiana/IDEM pretreatment delegation from EPA Region 5 – rule has been final adopted by the Water Pollution Control Board and sent to the Attorney General's Office for next step in the approval process.
2. Recruitment - municipalities next to be targeted for SGP recruitment include "hybrid" cities of Columbia City, Lebanon and Greenfield as some companies within those jurisdictions have already signed on. Editorial Note: "hybrids" are cities that have not been delegated authority for their pretreatment programs from EPA. Pretreatment permits issued for facilities in those cities are issued by OWM instead of the hybrid city.
3. From SURFIN/SGP Summit – need to develop model program to better define the SGP. If one already developed, it would be useful to share this information. Editorial note: Model program could include a "model" local ordinance incorporating language to implement the SGP, including authority for local performance-based benefits.

Emergency Preparedness Workgroup

1. Shayla reported on behalf of Dr. Corson. At the last meeting, Certified Metal Finishers had indicated a preliminary interest in pursuing this project. However due to the fire at the facility, the company is apparently continuing to recover from the fire.
2. CMTI posed the question of whether we should wait for Certified Metal Finishers to resume interest in pursuing the project, or seek out another volunteer. The group responded that we should not wait but move forward.

Therefore, CMTI is looking for a metal finisher to volunteer to serve as template for preparation of a manual. If companies interested, please contact Shayla.

3. A question was raised whether this manual would supplement an existing emergency plan. Shayla responded that this project could combine several regulatory required response plans (e.g., RCRA, oil) into one, uniform plan. Mark Sutton also noted that EPA has a template “One Plan” available on its website.

ANNOUNCEMENTS AND METAL FINISHER ISSUES

1. Alice Smith of CMTI reported that in conjunction with National P2 week, the 3rd annual Partners for Pollution Prevention Conference will be held on September 20 at the Valle Vista Country Club in Greenwood. The theme is “Problem Solving with P2”, (e.g., how to do P2, how to build it, how it effects the bottom line).
 - Cost is \$50/person and includes lunch. An optional golf outing following the conclusion of the conference is also planned.
 - The conference brochure will be coming out in the next couple of weeks. The Environmental Management Institute is handling registration for the conference.
 - Four vendor exhibit spaces are still left.
 - The conference is pending approval of 6 (six) wastewater operator certification continuing education units.
2. Nancy Norton reported that the AESF National website notes a national TRI workshop on reporting and other topics for manufacturers. The workshop will be held on July 31 in Elk Grove Village, Illinois. The website may be found at: www.aesf.org/newflash.html. The workshop is also noted under upcoming events at the SGP website: www.strategicgoals.org.
 - Ted Heemstra commented that Art’s column in the July Metal Finishing magazine regarding intermediates that may be formed in your plating bath as metals go into solution, such as cyanide complexes, might possibly be discussed at the July 31 workshop in addition to nitric acid.
3. Jerry Phillips noted a new recruitment address for facility sign on and phone # for the Coventry Group – the phone # is 703-354-2172. Shayla/CMTI has copies of the new industry sign-up forms. Editorial Note: Debbie/IDEM has copies of the POTW sign-up form.
4. Brendan Clemens circulated various plastic coupling flow control devices and ordering information from one vendor. For incoming water lines, these devices restrict water flow into the rinse tank.
5. Mr. Clemens also distributed an article from Parts Cleaning magazine concerning thermal oxidation of wastewater (for treatment) and noted that Wayne Metal might be a guinea pig for this technology, being targeted to platers.

IMPLEMENTATION PLAN FOR 2000-2001

Facilitator led a page-by-page review of the draft 2000-2001 implementation plan proposal prepared by IDEM. The following comments will be incorporated into this working draft:

1. Metal finisher and RCRA workgroup responsibilities – okay, no revisions.
2. POTWs – add the following:
 - Sue Claussen noted that South Bend has signed on to SGP and is working with the workgroup. Since South Bend is going through some ordinance changes now, perhaps this would be an opportune time to incorporate language reflecting the SGP. Sue will seek input from Claudio Ternieden, now with EPA Headquarters, or other states. By September 30, South Bend will have completed the changes to their ordinances.
 - Sue also reported that Lynn Newvine is now pretreatment coordinator for Elkhart. Elkhart still going through with some ordinance changes but Sue not sure of the current status. Although we should leave on hold for now (in the implementation plan), Sue will follow-up by contacting city to see who is involved in possible SGP ordinance changes.
 - Continue efforts with hybrid cities, when new metal finisher signs on, POTW group to work with city to get the city signed on to SGP as well.
3. EPA – Debbie to follow-up with EPA for their input by next stakeholder meeting.
4. IDEM – noted new schedule for development/implementation of the 5-Star recognition program – okay, no revisions.
5. Indiana Department of Commerce – nothing to change or add.
6. CMTI – noted that 3rd issue of the SGP newsletter has just come out. Possible topics/articles for newsletter to be forwarded to Shayla. CMTI has plans to get out the 4th issue in next month, with information about upcoming dragout seminars.

OTHER ANNOUNCEMENTS

- Dave Benshoof/Best Access noted he had received request from John Chavez/P2 Branch-OPPTA/IDEM for P2 success stories IDEM's commissioner can use as she gives talks around the state.
- Jerry Phillips announced IWPCA Industrial Committee's "Crisis Reaction Conference" at Valle Vista on August 3. Contact Jerry Phillips or Ted Moss/Eli Lilly for more information.

NEXT STEPS

1. IDEM to prepare meeting summary, update the Indiana SGP implementation plan, and distribute these documents. **A copy of the updated implementation draft for 2000-2001 is attached.**
2. Workgroups should continue to meet over the coming weeks.

DATE/LOCATION OF NEXT MEETING

Next quarterly meeting to tentatively to be held on October 19 from 11:00 a.m. to 1:00 p.m. Indianapolis time in either West Lafayette or Lebanon. IDEM/CMTI will work on finding a meeting location. At the October meeting, we'll discuss whether or not to meet again in December of this year, or go into the first part of 2001.

ADJOURNMENT

The facilitator adjourned the meeting at 2:50 p.m.

Attachments: Indiana SGP Implementation Plan for 2000-2001 – Updated 8-4-00